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2  
3 Chad M Creel  
4 5309669578  
5 Plaintiff, In Pro Per  
6 6250 County Road 20  
7 Orland, CA 95963  
8 ChadCreel1992@yahoo.com  
9 Plaintiff,  
10 In Pro Per  
11  
12

13 UNITED STATES DISTRICT COURT  
14  
15 EASTERN DISTRICT OF CALIFORNIA  
16  
17 Case No.: 2:25-cv-01957-TLN-CKD (PS)  
18  
19  
20 Plaintiff, ) FIRST AMENDED COMPLAINT  
21 **Chad Creel** )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 Defendants. )  
28 \_\_\_\_\_ **AMAZON.COM, INC.; META PLATFORMS, INC.; GOOGLE LLC; and DOES 1-50,**  
\_\_\_\_\_

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## 1                   **I. INTRODUCTION**

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4. Plaintiff **Chad Michael Creel** brings this action against Amazon.com, Inc.  
5 ("Amazon"), Meta Platforms, Inc. ("Meta"), and Google LLC ("Google") for  
6 coordinated interference with his legal activities and wrongful termination or  
7 restriction of his online accounts, culminating in the most severe and  
8 reputationally devastating action: Meta's **wrongful termination** of Plaintiff's  
9 account(s) on the false basis of "minor sexual exploitation," triggered by a  
10 **scammer's malicious setup** and automated enforcement error.

11

12. Plaintiff alleges that Defendants' conduct excluded him from essential digital  
13 infrastructures, blocked him from **retrieving evidence** needed for active cases,  
14 and **sabotaged** his legal efforts, including by deploying heavy legal resources  
15 against him immediately **on the 17th, just before an injunction hearing.**

16

17. Plaintiff further alleges Defendants acted jointly and/or knowingly in  
18 parallel to suppress his litigation, crush his access to the courts, and  
19 shield their own market power from challenge—conduct that violates federal  
20 antitrust law, constitutes a conspiracy to interfere with civil rights, and  
21 warrants declaratory and injunctive relief.

## 22                   **II. JURISDICTION AND VENUE**

23

24. This Court has jurisdiction under **28 U.S.C. § 1331** because Plaintiff asserts  
25 federal claims under the **Sherman Act**, 15 U.S.C. §§ 1-2, and **42 U.S.C. §**  
26 **1985(2)**, and seeks relief under the **Declaratory Judgment Act**, 28 U.S.C. §  
27 2201.

1       5. Supplemental jurisdiction exists under **28 U.S.C. § 1367** for related state-law  
2       claims arising from the same nucleus of operative facts.

3       6. Venue is proper under **28 U.S.C. § 1391(b)** because Defendants conduct  
4       substantial business in this District and a substantial part of the events or  
5       omissions giving rise to the claims occurred here.

### 7       **III. PARTIES**

8       7. Plaintiff **Chad Michael Creel** is a California resident and pro se litigant. He  
9       relies on online accounts to prosecute civil cases, organize evidence, and  
10       communicate with witnesses and courts.

12       8. Defendant **Amazon.com, Inc.** is a multinational technology company that provides  
13       e-commerce, cloud, and digital services that Plaintiff used for legal work and  
14       evidence management.

15       9. Defendant **Meta Platforms, Inc.** operates social and messaging platforms  
16       critical for communications, documentation, and legal evidence. Meta enforces  
17       content policies via automated tools and human review.

19       10. Defendant **Google LLC** operates search, email, account, and cloud services that  
20       Plaintiff relied upon for legal evidence collection, storage, and time-  
21       sensitive litigation tasks.

22       11. **Does 1-50** are unknown individuals or entities involved in or responsible for  
23       the conduct alleged herein. Plaintiff will amend to name them when identified.

### 25       **IV. FACTUAL ALLEGATIONS**

27       12. Plaintiff has pursued multiple legal actions challenging governmental and  
28       corporate misconduct. His work depends on uninterrupted access to online

1 platforms for **evidence preservation, witness communications, and court**  
2 **filings.**

3 13. Plaintiff developed a litigation framework known as the "**Leash Protocol**,"  
4 using lawful procedural tactics (including voluntary dismissal and refiling  
5 within applicable rules) to preserve rights and deter abusive litigation  
6 conduct by powerful opponents.

7 14. In or about **early 2025**, Plaintiff experienced escalating restrictions across  
8 Defendants' platforms that materially impaired his ability to prosecute cases  
9 and protect evidence.

10 15. **Amazon:** On or about **early 2025**, Amazon restricted or terminated Plaintiff's  
11 account access and related functions. These actions impaired Plaintiff's  
12 ability to receive, organize, and present evidence and to manage litigation-  
13 related purchases and records.

14 16. **Google:** On or about **early to mid-2025**, Google's **security mechanisms** locked  
15 Plaintiff out of critical accounts and imposed obstacles that, in practice,  
16 **prevented retrieval of essential evidence** for active matters. Appeals and  
17 recovery attempts were unsuccessful or unreasonably burdensome.

18 17. **Meta - Wrongful Termination for "Minor Sexual Exploitation":** On or about the  
19 **17th (immediately before an injunction hearing)**, Meta **terminated** Plaintiff's  
20 account(s) under the grave accusation of "**minor sexual exploitation**."

21 a. This label is **categorically false** and arose from a **scammer's malicious**  
22 **actions** and/or **automated detection error**, not from Plaintiff's conduct.  
23 b. Plaintiff never created, uploaded, solicited, or disseminated any material  
24 involving minors or sexual exploitation.  
25 c. The termination occurred **without fair notice, meaningful opportunity to**

1                   **contest, or context-sensitive human review**, despite the accusation's extreme  
2                   severity.

3                   d. Meta's termination **destroyed Plaintiff's reputation**, foreclosed  
4                   communications, and **cut off access to time-sensitive evidence** and witness  
5                   channels during a critical litigation window.

6                   e. The timing—**on the 17th, just before Plaintiff's injunction hearing**—  
7                   functioned as **sabotage**, impairing preparation and the ability to present or  
8                   authenticate evidence.

9  
10                  18. The **scammer** precipitating the Meta flag engaged in deceptive  
11                  contact/communication patterns typical of malicious actors who **weaponize**  
12                  **platform policies** to harm targets. Meta's failure to conduct a **contextual,**  
13                  **adversarial review** resulted in a **false positive** with catastrophic legal and  
14                  reputational consequences to Plaintiff.

15  
16                  19. Having branded Plaintiff with an accusation tantamount to **social and**  
17                  **professional exile**, Meta denied effective appeal and **locked away**  
18                  **communications/evidence** embedded within the terminated account(s), depriving  
19                  Plaintiff of access to court-relevant material.

20  
21                  20. The **combined effect** of Amazon restrictions, Google lockouts, and Meta's  
22                  wrongful termination was to **exclude** Plaintiff from critical digital  
23                  infrastructure, **cripple** his litigation capacity, **delay** filings, and **compromise**  
24                  evidentiary integrity.

25  
26                  21. On information and belief, Defendants were aware of Plaintiff's legal  
27                  activities, including the **imminent injunction hearing**, and acted with **reckless**  
28                  **disregard** for his right of access to courts—or in knowing parallel that such  
                        interference would suppress his litigation.

1 22. Defendants' market dominance in their respective spheres (e-commerce/cloud,  
2 social/messaging, search/email/accounts) meant their actions **foreseeably** and  
3 **directly** impaired Plaintiff's ability to compete, invent, collaborate, and  
4 litigate.

5 23. Plaintiff suffered **reputational harm, emotional distress, lost litigation**  
6 **opportunities, increased costs, and deprivation of evidence** and communications  
7 necessary to prosecute his cases.

8 24. Plaintiff timely objected and attempted to recover access; Defendants refused  
9 or failed to provide **prompt, transparent, and effective remediation**,  
10 especially where the accusation at Meta—**minor sexual exploitation**—required  
11 heightened due process and accuracy.

12 25. Defendants' conduct also **chilled Plaintiff's petitioning activity** and **burdened**  
13 the exercise of his right to seek judicial redress.

## 16 **V. CLAIMS FOR RELIEF**

### 17 **Claim I – Monopolization and Attempted Monopolization (Sherman 18 Act § 2)**

20 *(Against All Defendants)*

22 26. Plaintiff re-alleges ¶¶ 1-25.

23 27. Defendants possess and exercise **durable market power** within essential digital  
24 markets—Amazon (commerce/cloud), Meta (social/messaging), and Google  
25 (search/email/accounts).

26 28. Defendants engaged in **exclusionary conduct** that lacked legitimate business  
27 justification as applied to Plaintiff: wrongful termination, security lockouts

1 that functioned as **evidence denial**, and timing calculated (or recklessly  
2 indifferent) to **sabotage** an imminent injunction hearing.

3 29. Meta's false "minor sexual exploitation" designation-triggered by a **scammer's**  
4 **setup** and **automation missire**—is an **extreme and foreseeable over-enforcement**  
5 that effectively **excludes** a litigant from vital social/evidence channels  
6 **without adequate review**.

7 30. The combined, platform-wide restrictions **substantially foreclosed** Plaintiff  
8 from using standard digital infrastructure to assemble evidence and coordinate  
9 litigation, entrenching Defendants' dominance and suppressing Plaintiff's  
10 competitive and petitioning activities.

11 31. Defendants' conduct constitutes **monopolization** and/or **attempted monopolization**  
12 under **15 U.S.C. § 2**. Plaintiff was **injured in his business and property** by  
13 reason of this violation and is entitled to **treble damages** and injunctive  
14 relief.

15  
16 **Claim II – Conspiracy to Interfere with Civil Rights (42**  
17 **U.S.C. § 1985(2))**

18 (Against All Defendants)

21 32. Plaintiff re-alleges ¶¶ 1-31.

22 33. Defendants agreed, tacitly or expressly, and/or knowingly acted in parallel to  
23 **obstruct** Plaintiff's access to the courts by: (a) **terminating/locking**  
24 accounts, (b) **withholding** access to **time-sensitive evidence**, (c) imposing  
25 **security barriers** that prevented recovery, and (d) **timing** critical actions  
26 (Meta on the **17th**) to **undermine** Plaintiff's **injunction hearing** preparation and  
27 presentation.

1 34. The conspiracy (or knowing parallel conduct) aimed to **deter, intimidate, or**  
2 **hinder** Plaintiff—a litigant—from fully prosecuting his claims, including those  
3 implicating major corporate actors and governmental entities.

4 35. Plaintiff suffered concrete injuries: loss of evidence access, litigation  
5 delay, reputational devastation from a false “minor sexual exploitation”  
6 label, emotional distress, and increased costs and burdens in prosecuting his  
7 cases.

8 36. Defendants are liable under **42 U.S.C. § 1985(2)** for conspiracy to interfere  
9 with Plaintiff’s right of access to the courts and to obstruct justice.

10 **Claim III – Declaratory and Injunctive Relief (28 U.S.C. §**  
11 **2201)**

12 (Against All Defendants)

13 37. Plaintiff re-alleges ¶¶ 1-36.

14 38. An actual, justiciable controversy exists regarding Plaintiff’s rights to: (a)  
15 maintain and access lawful accounts, (b) retrieve and preserve lawful  
16 evidence, (c) be free from wrongful termination grounded on **false accusations**  
17 triggered by scammers and erroneous automated enforcement, and (d) be free  
18 from timing games that **sabotage** court access.

19 39. Plaintiff seeks a **declaration** that Defendants’ practices, as applied to him,  
20 are unlawful, and an **injunction** ordering:

- 21 a. **Restoration** of Plaintiff’s access to accounts and content;
- 22 b. **Preservation** and **return** of Plaintiff’s lawful data and communications;
- 23 c. **Process safeguards** for high-severity accusations (e.g., child safety),  
24 including prompt human review, notice, and an **effective appeal**;

d. **Prohibition** on retaliatory or obstructionist actions that impede Plaintiff's litigation and evidence access.

#### Claim IV – Defamation Per Se (State Law)

*(Against Meta Platforms, Inc.)*

40. Plaintiff re-alleges ¶¶ 1-39.

41. Meta **published** (to internal teams and/or third parties, and by functional effect to Plaintiff's contacts) that Plaintiff's account was terminated for "minor sexual exploitation."

42. The statement and/or functional publication is **false, unprivileged**, and **defamatory per se** because it imputes involvement in egregious criminal conduct.

43. Meta acted at least with **negligence**, and on information and belief with **reckless disregard** for truth, by failing to evaluate context, account compromise risks, or the **scammer's role**, and by refusing meaningful appeal before imposing permanent reputational ruin.

44. Plaintiff suffered **presumed damages** (per se), concrete reputational harm, emotional distress, and litigation injury flowing from Meta's false accusation and termination.

## Expansion Plan 1. Background Facts (bulk expansion - +6 pages)

- **Detailed timeline** of each defendant's interference:

1                   o Amazon restrictions (dates, how you discovered lockouts, appeals made).

2                   o Google lockouts (how “security features” blocked recovery, how it

3                    prevented retrieving evidence for specific lawsuits).

4

5                   o Meta’s wrongful “minor sexual exploitation” termination (include context

6                    of the scammer, what evidence/messages you lost, reputational fallout).

7

8           • **Injunction hearing sabotage:** expand on how Meta’s timing crippled your ability

9                    to present.

10

11           • **Scammer setup:** describe tactics scammers use to trigger automated flags, why

12                    Meta should’ve caught it, and how this fits into broader corporate negligence.

13

14           • **Leash Protocol:** add 2-3 pages explaining how it works, why it’s lawful, and

15                    why platforms obstructing it obstruct your access to justice.

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16           **2. Claims for Relief (authority expansion - +3 pages)**

17

18           • **Sherman Act §2:** cite *United States v. Microsoft Corp.*, 253 F.3d 34 (D.C. Cir.

19                    2001) for exclusionary conduct.

20

21           • **Civil Rights Conspiracy (§1985(2)):** cite cases where private actors conspired

22                    with others to interfere with court access.

23

24           • **Defamation (Meta):** cite California law on defamation per se (accusing someone

25                    of a crime of moral turpitude).

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26

27           **3. Damages & Relief (add specificity - +1 page)**

28

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- 1     • **Economic damages:** lost opportunity costs, filing delays, increased litigation  
2         expenses.
- 3     • **Reputational damages:** emphasize that "minor sexual exploitation" is  
4         reputational death.
- 5     • **Injunctive relief:** demand restoration, fair appeal mechanisms, notice before  
6         termination.
- 7
- 8

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9     **4. Conclusion & Jury Demand (polished - +½ page)**

10

11     **Meta Wrongful Termination (Extra 1 page)**

12

- 13     • Flesh out **how scammers manipulate platforms** to trigger false flags.
- 14     • Explain why Meta's reliance on **automated enforcement without appeal** is  
15         reckless, especially for accusations as devastating as child exploitation.
- 16
- 17     • Highlight reputational harm – once labeled, you're treated as guilty with no  
18         way to clear your name.

19

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20

21     **2. Injunction Hearing Sabotage (Extra 1 page)**

22

- 23     • Detail how the account loss on the **17th** disrupted witness coordination,  
24         evidence presentation, and filing prep.
- 25     • Show causation: Meta's action directly undermined your ability to argue for  
26         the injunction.
- 27
- 28     • Argue this was not just negligent but **tantamount to obstruction of justice**.

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### 3. Expansion Plan - Legal/Case Law Focus

#### 1. Antitrust (Sherman Act §§1-2)

- **New Case Law Support:**

- *United States v. Microsoft Corp.*, 253 F.3d 34 (D.C. Cir. 2001) – exclusionary conduct, sabotaging rivals, same logic applies where platforms cut you off.
- *Eastman Kodak Co. v. Image Tech. Servs., Inc.*, 504 U.S. 451 (1992) – companies can monopolize aftermarket access; here, you're locked out of essential "aftermarkets" like accounts/evidence storage.
- Add a **Sherman Act §1 conspiracy claim** alongside §2 monopolization, alleging Defendants acted jointly or knowingly in parallel to obstruct your litigation.

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#### 2. Civil Rights Conspiracy (42 U.S.C. §1985(2))

- **Expand Legal Basis:**

- Cite *Kush v. Rutledge*, 460 U.S. 719 (1983) – §1985(2) applies where conspiracies obstruct justice or deter parties from presenting claims.
- Argue Defendants' **timing** (Meta on the 17th) = deliberate obstruction of justice.
- Stress that even private actors can be liable if their conspiracy aims at obstructing courts.

1

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2 **3. Defamation Per Se (Meta)**

3

4 • **Add California Cases:**

5       ○ *Slaughter v. Friedman*, 32 Cal. 3d 149 (1982) – defamation per se when  
6       accusations injure in a person's profession.

7

8       ○ *Regalia v. The Nethercutt Collection*, 172 Cal. App. 4th 361 (2009) –  
9       accusation of criminal conduct is defamation per se.

10     • Frame Meta's "minor sexual exploitation" tag as defamation per se under  
11     California law, with presumed damages.

13

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14 **4. Constitutional Right of Access to Courts**

15

16     • Even though your main claims are against private companies, add a **First**  
17     **Amendment / right of access framing** under *California Motor Transport Co. v.*  
18     *Trucking Unlimited*, 404 U.S. 508 (1972):

19       ○ SCOTUS recognized that conspiracies to bar access to courts **violate**  
20       **federal law**.

22       ○ Tie this directly to the Leash Protocol and your obstruction claim.

24

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25 **5. New Claim – Intentional Interference with Prospective**  
26 **Economic Advantage (State Law)**

27

28     • You can add this as Claim V:

1           o Defendants interfered with your prospective relationships (legal cases,  
2            collaborations, potential settlements).  
3  
4           o Case cite: *Korea Supply Co. v. Lockheed Martin Corp.*, 29 Cal. 4th 1134  
5            (2003).  
6

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7  
8  
9 **VIII. CONCLUSION**

10           311. Defendants Amazon, Meta, and Google are not mere private service  
11            providers making routine account decisions. Together, they operate as  
12            gatekeepers to modern commerce, communications, evidence storage, and legal  
13            advocacy.

14  
15           312. By wrongfully terminating Plaintiff's accounts, locking him out of  
16            critical evidence, and falsely branding him with the most stigmatizing  
17            accusation imaginable – "minor sexual exploitation" – Defendants caused  
18            irreparable reputational harm, disrupted ongoing litigation, and deprived  
19            Plaintiff of fair access to the courts.

20  
21           313. The timing of Meta's termination, on the 17th immediately before  
22            Plaintiff's injunction hearing, reveals conduct not of error but of sabotage.  
23           It constituted obstruction of justice, striking at the very core of  
24           Plaintiff's First Amendment right to petition the courts.

25  
26           314. The Defendants' conduct also entrenched their own monopolistic power. By  
27           excluding Plaintiff from their platforms, they not only injured him personally  
28           but foreclosed his ability to compete, collaborate, and bring accountability

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1 through litigation. This exclusionary behavior falls squarely within the  
2 prohibitions of the Sherman Act.

3 315. Plaintiff has pleaded multiple viable causes of action – federal  
4 antitrust violations, conspiracy to obstruct court access under §1985(2),  
5 defamation per se under California law, and intentional interference with  
6 prospective economic advantage. These claims present live controversies and  
7 fall squarely within this Court's jurisdiction.

8 316. Federal courts exist to ensure that powerful entities cannot destroy  
9 individuals by cutting off their voice, their evidence, or their access to  
10 justice. If the allegations in this complaint are proven, the law requires  
11 that Defendants be held accountable.

12 317. Accordingly, Plaintiff respectfully asks this Court to allow this case  
13 to proceed to discovery and trial, where the truth of these matters can be  
14 established under oath, and where remedies may be fashioned to restore both  
15 the integrity of Plaintiff's litigation efforts and the fairness of the  
16 marketplace.

## 19 VI. PRAYER FOR RELIEF

20 Plaintiff respectfully requests that the Court:

21 A. Enter judgment for Plaintiff on all claims;  
22 B. Award **compensatory damages** in an amount to be proven at trial;  
23 C. Award **treble damages** under the Sherman Act, **15 U.S.C. § 15**;  
24 D. Award **punitive damages** for willful and malicious conduct;  
25 E. Issue **declaratory relief** that Defendants' conduct, as applied to Plaintiff, is  
26 unlawful;  
27 F. Issue **injunctive relief** requiring restoration of account access, data

1 return/preservation, appeal due-process safeguards for severe accusations, and  
2 prohibitions on further retaliatory interference;

3 G. Award **costs and fees** as permitted by law; and

4 H. Grant such other relief as the Court deems just and proper.

5 I, Chad Michael Creel, am the Plaintiff in this action. I have read the foregoing  
6 **First Amended Complaint** and know the contents thereof. The facts stated in this  
7 complaint are true and correct to the best of my knowledge, information, and belief.  
8 I declare under penalty of perjury under the laws of the United States of America  
9 that the foregoing is true and correct.

10  
11  
12   
13  
14 THE LEGAL RIPPER

15  
16 9/30/2025  
17  
18

19 **Chad Creel**

20 **6250 County Rd 20**

21 **Orland Ca 95963**

22 **5309669578**



**The Legal Ripper**

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